

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff

NO. CR18-060-RAJ

v.

DISCOVERY PROTECTIVE ORDER

SAMUEL FENTAHUN,  
Defendant.

This matter having come before the Court on a Stipulated Motion for Entry of a  
Discovery Protective Order, the Court hereby enters the following:

**DISCOVERY PROTECTIVE ORDER**

**A. Definitions**

As used in this Order, the term “Protected Information” means any date of birth,  
Social Security number, driver’s license number, bank account number, credit card  
number, personal identification number, address, telephone number, name and/or location  
of employment, criminal history record, background check, immigration history/status,  
and/or any other similar information or number implicating a privacy interest and  
belonging to an individual, business, partnership, or corporation.

1 “Protected Information” also includes the name of any victim of the charged  
2 offenses or any non-defendant witness.

3 As used in this Order, the term “Protected Material” means any document or other  
4 record containing or reflecting Protected Information.

5 **B. Procedures**

6 The government is not required to redact Protected Information that pertains only  
7 to the Defendant or an immediate family member of the Defendant.

8 Defense counsel may produce to the Defendant any documents that contain  
9 Protected Information or Protected Material that pertains only to the Defendant or an  
10 immediate family member of the Defendant. Defense counsel may also produce any  
11 document to the Defendant that that does not contain any Protected Information or  
12 Protected Material.

13 Items designated in the government’s discovery log as “Protected” contain  
14 Protected Information and the associated files and/or documents are not to be produced to  
15 the Defendant except as described below.

16 Possession of all other Protected Information and/or Protected Material is hereby  
17 limited to the attorneys of record in the above captioned case and their investigators and  
18 agents. The attorneys of record and their investigators and agents may review Protected  
19 Information and/or Protected Material with the Defendant. The Defendant may visually  
20 inspect and review such documents but shall not be allowed to possess Protected  
21 Information (such as unredacted copies of Protected Material or notes, copies, or  
22 photographs of such Protected Material containing Protected Information). The  
23 Defendant may possess documents from which all Protected Information has been  
24 redacted.

25 The attorneys of record and their investigators and agents may review or discuss  
26 the contents of documents containing Protected Material with any prospective witness, as  
27 long as the attorneys of record and investigators and agents do not share the unredacted  
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1 documents, or share any Protected Information of victims or witnesses, with any  
2 prospective witness.

3 If any Protected Information or Protected Material is filed in court or otherwise  
4 disseminated as part of litigation, the parties agree to redact such information prior to  
5 filing; unless, based on a party's application prior to filing, the Court finds that an  
6 unredacted filing is necessary and appropriate.

7 For redactions, numbers that constitute Protected Information shall be redacted to  
8 the last 2-4 digits and names shall be redacted to initials, or otherwise as needed to  
9 comply with applicable federal and local rules.

10 The attorneys of record and their investigators and agents shall keep any Protected  
11 Material secured whenever the Protected Material is not being used in furtherance of their  
12 work in the above-captioned case.

13 All documents containing Protected Material shall be returned to the  
14 United States, or destroyed, once all charges are resolved by dismissal or by final  
15 conviction.

16 The parties agree that this Protective Order may be modified, as necessary, by  
17 filing with the Court a Stipulated Order Modifying the Protective Order, or by other order  
18 of the Court.

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20 DATED this 30th day of March, 2018.

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23 The Honorable Richard A. Jones  
24 United States District Judge  
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